

1 Q Well, now, whose choice was to either clear it
2 through Mike or clear it through the GM? That would have
3 been your choice, right?

4 A Do you do a lot of radio, because you don't
5 understand how radio works?

6 Q No, sir, I am an attorney.

7 Q Okay.

8 Q I do very little radio.

9 A I don't know if you represent enough radio
10 stations to know --

11 Q Listen to my question. It's a very specific one.
12 Who made the decision on whether to clear a
13 certain item through the GM or through Mike Rice? You made
14 that decision, right?

15 A No, that is not correct. That is the accepted
16 radio standard. You work your way up the lines of command
17 before you make a major decision.

18 Q Well, why did you go to Mike Rice before you went
19 to your GM if you were working your way up your line of
20 command?

21 A Because I was working more directly with Mike Rice
22 after Richard Hauschild became general manager, because
23 Richard was put in that position from a sales position.

24 Q Mike Rice is the owner of these stations when you
25 were employed there, right?

1 A That's correct.

2 Q The general manager is in a position in the
3 hierarchy lower than the owner. isn't he?

4 A That is correct.

5 Q Okay. Now, would you say that you and Mr.
6 Hauschild got along well?

7 A Well?

8 No, not really well

9 Q Okay. And did you find it easier to talk to Mr.
10 Rice than to talk to Mr. Hauschild?

11 A No.

12 Q No.

13 A No, it was -- they were two totally different
14 sections. One was programming. That was Mike. One was
15 promotions, and that was Richard, because promotions --

16 Q Is it fair to say --

17 A -- is directly tied to sales.

18 Q Is it fair to say that you didn't get along with
19 Mike Rice the way you didn't get along with Mr. Hauschild?

20 A No, that's not fair to say either, to use the word
21 "fair."

22 Q You did get along with Mike Rice, correct?

23 A Um-hmm.

24 JUDGE STEINBERG: That's a yes?

25 THE WITNESS: Yes. I'm sorry.

1 BY MR. GAFFNEY:

2 Q Now, you testified that Mr. Rice was not involved,
3 to your knowledge, in your termination?

4 A To my knowledge, no

5 Q But you have also testified that, at least in your
6 opinion, whatever Mike Rice said around that radio station,
7 that's what went, right?

8 A Yes.

9 Q What Mike says goes
10 At the time you were terminated you still
11 considered yourself to be friends with Mr. Rice, right?

12 A When I was terminated?

13 Q Yes.

14 A Yes, I did.

15 Q Now, if Mr. Rice was in control of the stations,
16 his friend was getting terminated --

17 A I'm sorry, I --

18 Q -- he could have turned that around, right?

19 A I missed your question because I would like to
20 qualify an answer that I gave you a minute ago.

21 Q Well, listen --

22 JUDGE STEINBERG: Let him clarify the answer, and
23 then answer.

24 THE WITNESS: Okay. And that was the question
25 regarding friends to Mike Rice after I was fired.

1 BY MR. GAFFNEY.

2 Q Not after. Before.

3 A I'm sorry. Before I was fired?

4 Q Just before.

5 A Just before.

6 Q You considered yourselves friends with them. You
7 didn't have a falling out with him or anything, did you?

8 A I'm not certain. And the reason why I say that is
9 because after he was convicted of those charges, there were
10 a lot of other question marks in my mind because I had
11 always construed him innocent until proven guilty.

12 Q Okay.

13 A And at that point he became guilty, and I wasn't
14 certain where my respect should remain.

15 Q All right. Now, I am not talking right now about
16 your --

17 A And subsequent friendship and bond, common bond.

18 Q What I am saying, if Mr. Rice still considered you
19 as a friend, and you were in charge of the station, and his
20 friend is getting fired, then he could have turned that
21 around, made sure you weren't fired, right?

22 A Oh, you are asking if Michael Rice considered me
23 his friend?

24 Q I am asking you if Michael Rice could have stopped
25 your firing.

1 MR. MASTANDO: Calls for speculation, Your Honor.

2 How does --

3 MR. GAFFNEY: Well, wait a minute.

4 BY MR. GAFFNEY:

5 Q You worked at the radio stations. You said Mike
6 Rice is in control of a whole bunch of things.

7 Was he in control enough to stop your firing?

8 A Well, you are asking whether or not I know if Mike
9 Rice -- okay, you are asking if I could speculate on whether
10 or not Mike Rice could have stopped my firing.

11 Let me put it this way. I suspect that Mike Rice
12 condoned my termination

13 Q You expect he condoned --

14 A I suspect, I suspect he condoned --

15 Q You suspect --

16 MR. MASTANDO: Objection, Your Honor.

17 THE WITNESS: -- because I know of his operation
18 as an owner of a station.

19 JUDGE STEINBERG: Well, we have an objection.

20 BY MR. GAFFNEY:

21 Q If Mike --

22 JUDGE STEINBERG: Mr. Gaffney.

23 MR. GAFFNEY: Excuse me.

24 JUDGE STEINBERG: Okay, I have let you go on cause
25 it was kind of interesting, frankly. But, you know, let's

1 avoid the speculation.

2 MR. GAFFNEY: Sure

3 JUDGE STEINBERG: And be a little more factual.

4 BY MR. GAFFNEY:

5 Q In your observations, you had testified that when
6 Mr. Rice said that a certain hiring or firing decision was
7 supposed to happen, it happened, right?

8 A Um-hmm. Yes.

9 Q And under --

10 A And that's why --

11 Q -- that experience, if Mike Rice wanted to stop
12 you from being fired, your testimony would be he could have?

13 A That's correct, and that's why I suspect that he
14 was involved in the firing.

15 Q So then he changed his mind about you, huh?

16 A It's possible.

17 Q The man you say never changes his mind.

18 A That's possible.

19 Q Now, at one point in your deposition in the case
20 for wrongful termination against Contemporary, did you make
21 a statement to the effect that "I'm going to get Mike Rice.
22 I'm going to get his stations "?

23 A What?

24 Q Did you make a statement to the effect that "I'm
25 going to get Mike Rice," or "I'm going to get his stations"?

1 A In my deposition?

2 Q Not on the record but while you were there in
3 front of others, do you recall saying that?

4 A No.

5 Q Or anything like that?

6 A No, not at all. I don't want whatever station he
7 has got.

8 Q And you never said that "I'll get Mike Rice"?

9 A No, I did not.

10 And, further, I would never.

11 JUDGE STEINBERG: There is no pending question.

12 THE WITNESS: I'm sorry.

13 BY MR. GAFFNEY:

14 Q In fact, what you did say on the record though is
15 that you would get all that the law allowed, right?

16 A That's correct. All that the law will allow in my
17 particular case.

18 MR. GAFFNEY: No further questions of this
19 witness, Your Honor.

20 JUDGE STEINBERG: Redirect?

21 MR. MASTANDO: Yes, Your Honor.

22 MR. ZAUNER: Could we have just a couple of
23 minutes, Your Honor?

24 JUDGE STEINBERG: Sure. Let's go off the record.

25 (Whereupon, a recess was taken.)

1 JUDGE STEINBERG: We are back on the record.

2 Redirect, Mr. Mastando?

3 REBUTTAL REDIRECT EXAMINATION

4 BY MR. MASTANDO:

5 Q You mentioned that Michael Rice was upset at one
6 point when the 10 record were changed, and he didn't like
7 the fact that so many new records were put into the
8 rotation?

9 A Right, I do recall that.

10 Q Were 10 records ever -- after he -- after he
11 expressed his displeasure, were 10 records ever changed, put
12 into the format again after that?

13 A I don't believe so.

14 The only way for me to know absolutely certain is
15 to go back through radio and records and find out. But I
16 don't recall having added that many records. That is just
17 not an acceptable thing.

18 Q You mentioned that a paper trail or documentation
19 was created, or you mentioned that a paper trail or
20 documentation was established to fire Janice Pratt.

21 A Yes, that is correct.

22 And I should add that a paper trail is a phrase
23 that I have just picked up along the way. Documentation is
24 the more appropriate way to characterize it.

25 Q Were any items in that documentation fabricated?

1 A Oh, no, not at all

2 Q Why did you document particular episodes?

3 A Well, I knew just from experience with the company
4 that a termination had to be documented to keep the station
5 from getting into any legal challenges of any sort. And, in
6 fact, we did end up in a question on sex discrimination with
7 her, even with that documentation

8 Q Why didn't you say during your deposition -- I
9 strike my last question. I withdraw the last question.

10 Would you have created that documentation on
11 Janice Pratt if Michael Rice had not ordered you to fire or
12 had not suggested that she be fired?

13 A Would I still have created that documentation?

14 I would have, but I would not have fired her had
15 Mike not told me to. But if I would have fired anyone, I
16 would have still created that documentation.

17 Q You have characterized Michael Rice as making up
18 his mind and being difficult to change, it was difficult to
19 change his mind thereafter.

20 A Um-hmm.

21 Q Is that true?

22 A That is correct, and perhaps the previous
23 statement that I made about Mike never changes his mind
24 might be a little over dramatic. I am a disc jockey. The
25 reality is that it was a very difficult thing to change his

1 mind. There had better be some darn good explanations why
2 something was done if it was not done his way. And I don't
3 mean that I am a cry baby or anything either. But there is
4 a certain amount of that to his personality.

5 Q Now, there were a number of people that were
6 mentioned -- Janice Pratt, Robert Kinneson, Mike Steel, Sean
7 Madden, Jeff Davis, Mark Savage, Ben Orzeske -- about which
8 you testified Mike directed or suggested certain things,
9 particularly their termination.

10 Did you act inconsistent with those directions?

11 A Inconsistently you mean, or consistently?

12 Q Did you disregard what Michael Rice said about
13 firing people?

14 A Oh, no, absolutely not.

15 Q Did you -- you testified that you delayed firing
16 on occasion.

17 A Well, there is a couple of circumstances
18 surrounding all of this.

19 First of all, before you let somebody go you have
20 to have somebody to replace them. So the recruiting process
21 can take a long time to do.

22 In the case of Janice Pratt, I started recruiting,
23 started talking to the part timer. The part timer then was
24 on Mike's hit list, and so both of them had to go. I found
25 a part timer first. I did not have anybody else in my part-

1 time pool to take Janice Pratt's place, so I needed to find
2 somebody else.

3 It took me a little while to do that, but I did
4 find somebody and had somebody in there the next day, the
5 next business day that Janice Pratt would have been working.

6 Q Are you suggesting that there is a process to a
7 termination?

8 A Oh, absolutely, because you certainly do not want
9 to have a vacancy on the air staff. It's bad enough
10 whenever somebody quits with two weeks notice, and it takes
11 you five weeks to get somebody in there.

12 Q There is a certain hierarchy in the Contemporary
13 Media Group. And I use that phrase to mean all three
14 Licensees, Contemporary Broadcasting, Contemporary Media and
15 Lake Broadcasting.

16 You were in a position. Your position as group
17 programmer, were you directly responsible to a particular
18 organization or did you -- or were you responsible to a
19 series of organizations?

20 A Well, yes, the responsibilities varied though,
21 however. With Lake Broadcasting, the only involvement
22 really there was regarding talent recruitment, and it was in
23 the context of if I -- if while recruiting for WZZQ, which I
24 think is Contemporary Media, and KFMZ, which is
25 Contemporary, that if I came across somebody that would be

1 good for the Lake, to let Mike know.

2 Q From what accounts did you receive your payroll
3 check?

4 A Contemporary --

5 MR. GAFFNEY: Objection, Your Honor. This goes
6 way beyond cross.

7 JUDGE STEINBERG: Sustained.

8 MR. MASTANDO: Your Honor, may I respond?

9 JUDGE STEINBERG: No.

10 BY MR. MASTANDO:

11 Q Were you in any way responsible to both
12 Contemporary Media and Contemporary Broadcasting as part of
13 this hierarchy?

14 MR. GAFFNEY: Same objection. Objection.

15 JUDGE STEINBERG: Where is this going? I mean,
16 why couldn't you have asked him this on direct?

17 I don't think the organizational structure was
18 mentioned in the cross.

19 MR. MASTANDO: It was, Your Honor, in so much as
20 opposing counsel suggested that Paul Hanks was not reporting
21 to -- was reporting to Richard Hauschild as opposed to
22 Michael Rice, and there are reasons for that because --

23 JUDGE STEINBERG: Well, just ask him those
24 questions, why did you go to Rice without first going to
25 Hauschild. I mean, if that's what the question is. I might

1 ask it myself if you don't. But I don't think the
2 organizational structure -

3 BY MR. MASTANDO:

4 Q Okay, to paraphrase Your Honor's question, were
5 there reasons why you would go to Michael Rice instead of
6 Richard Hauschild?

7 A Yes. Richard and I worked primarily on the
8 promotion side of programming. As I mentioned, programming
9 is a multifaceted area with that company. Some companies
10 have a promotions director. In this case, programming
11 handled promotions. So I went to Richard Hauschild
12 regarding promotions because most of them are sales
13 oriented.

14 With Mike Rice, it was more of the other
15 programming, the music, the station critiques, the disc
16 jockey critiques, things of that nature. Those are the
17 items that were discussed with Mike.

18 Q You understood Richard Hauschild's role as general
19 manager for --

20 MR. GAFFNEY: Objection, Your Honor. If he wants
21 to ask what Hauschild's role was, that's --

22 JUDGE STEINBERG: Yes, ask what was Hauschild's
23 role.

24 BY MR. MASTANDO:

25 Q What organization was Richard Hauschild the

1 general manager for?

2 A He was general manager of KFMZ which is
3 Contemporary. And he was my immediate supervisor.

4 JUDGE STEINBERG: Okay, we have two
5 Contemporaries. We have Contemporary Media, Inc. and
6 Contemporary Broadcasting, Inc.

7 THE WITNESS: Right

8 JUDGE STEINBERG: So when you say "Contemporary,"
9 you should be more specific.

10 THE WITNESS: All right

11 JUDGE STEINBERG: If you can.

12 THE WITNESS: Okay. Contemporary Broadcasting was
13 KFMZ. And Contemporary Media was WZZQ. Richard Hauschild
14 was the general manager of Contemporary Broadcasting's KFMZ.
15 And the general manager position is a sales position. I
16 mean, it's like a sales manager position essentially. There
17 are some general management things, obviously, personnel
18 office, having your office manager report to you, and in my
19 case as well. The program director reports to you on
20 specific items as it relates to his position, which were
21 sales-related items from programming, that's promotions.

22 Is that making sense or am I getting really weird?

23 BY MR. MASTANDO:

24 Q Did your responsibilities extend beyond
25 Contemporary Broadcasting?

1 A Yes, they did.

2 I worked -- in regards to working for WZZQ, which
3 is part of Contemporary Media. is that what -- okay, yes.
4 Yes, they did in that working with the program director
5 there, and program consultant/advisor, group program
6 director, whatever you what to call it. So in that case,
7 yes. Yes, indeed, it did go over into Contemporary Media.

8 And I guess I have referred to them all along as
9 just the two different stations

10 MR. MASTANDO: No further questions, Your Honor.

11 JUDGE STEINBERG: Okay, now, my question is why
12 did you take some things up with Mr. Rice directly without
13 going through Mr. Hauschild, if you did that? And I think
14 the testimony was that you did.

15 THE WITNESS: Oh, yes, I did.

16 Programming issues were always taken up with Mike.
17 And so those were the items that were taken up directly with
18 Mike.

19 JUDGE STEINBERG: Did Mr. Hauschild ever say don't
20 talk to Mike before you talk to me?

21 THE WITNESS: No. No.

22 One time, though, he did bring up music himself,
23 and it was at a budget meeting. But that was the only time
24 that he brought up the music in a meeting setting.

25 JUDGE STEINBERG: Okay, are you familiar with the

1 abbreviation at the bottom of memos, "cc"?

2 THE WITNESS: Yes.

3 JUDGE STEINBERG: And what does that mean?

4 THE WITNESS: That means carbon copy.

5 JUDGE STEINBERG: Do you know or are familiar with
6 the abbreviation at the bottom of memos, the bottom of a
7 copy of a memo, "bc"?

8 THE WITNESS: No.

9 JUDGE STEINBERG: Okay. Did you ever hear the
10 phrase "blind copy"?

11 THE WITNESS: No.

12 JUDGE STEINBERG: Okay.

13 MR. GAFFNEY: One question recross?

14 JUDGE STEINBERG: One question. I don't normally
15 allow it but I will since it's just one question.

16 MR. GAFFNEY: A single question.

17 REBUTTAL RECROSS EXAMINATION

18 BY MR. GAFFNEY:

19 Q Sir, you said in response to Mr. Mastando's
20 redirect that you might have misstated when you said Mr.
21 Rice never changed his mind, and then you said "that's
22 because I'm a disc jockey."

23 A Yes.

24 Q Did you mean by that you have a tendency to
25 exaggerate, sir?

1 A In this courtroom?

2 MR. MASTANDO: Objection, Your Honor.

3 MR. GAFFNEY: No.

4 JUDGE STEINBERG: Overruled.

5 BY MR. GAFFNEY:

6 Q Did you mean by that statement that you have a
7 tendency to exaggerate?

8 A Exaggerate. I can have the tendency to
9 exaggerate.

10 MR. GAFFNEY: Thank you, sir.

11 JUDGE STEINBERG: Okay, and let me just ask you.

12 MR. MASTANDO: Your Honor, I would like to --

13 JUDGE STEINBERG: I'm taking care of it.

14 Have you exaggerated in the courtroom today?

15 THE WITNESS: Through the re-questioning or
16 whatever, it appears that I have exaggerate the statement
17 about Mike Rice's change of mind.

18 Regarding the other statements that have been
19 made, I do not believe that I have exaggerated anything. I
20 have tried to answer as honestly and as straightforward as
21 possible.

22 In regards to that comment about Mike, Mike is a
23 very headstrong person, and he can be very difficult to
24 discuss things with. And so based upon that it is very,
25 very difficult to change his mind.

1 JUDGE STEINBERG: But he does change his mind?

2 THE WITNESS: Occasionally.

3 JUDGE STEINBERG: Do you want to follow that? You
4 don't have to if you don't want to.

5 MR. MASTANDO: I think I got the answer that I
6 wanted from the witness in my last question. Thank you.

7 JUDGE STEINBERG: Okay. I think you can be
8 excused now. I would ask you not to discuss your testimony.
9 Have you spoke -- I wanted to ask you this.

10 Have you spoken with John Rhea recently?
11 Recently, in let's say within the last year?

12 THE WITNESS: No. The last time I spoke with him
13 was during that business trip to fire Mark Savage.

14 JUDGE STEINBERG: Okay. But you haven't spoken
15 with him over the last several months concerning any of the
16 matters that we talked about today?

17 THE WITNESS: No, sir. I haven't.

18 JUDGE STEINBERG: Okay. And I would just urge you
19 not to speak with anybody. I mean, this case isn't
20 finished. It's possible that you will be recalled.

21 THE WITNESS: I'm sorry, i didn't mean to --

22 JUDGE STEINBERG: That's okay.

23 THE WITNESS: -- be so facial with you. I guess I
24 wasn't happy about this.

25 JUDGE STEINBERG: And unhappy look crossed your

1 face for the record.

2 But it's possible that you will be recalled so I
3 would direct you not to talk about your testimony here today
4 with anybody. You can talk with Mr. Gaffney, Ms. Sadowsky
5 or the Bureau's counsel, or certainly your own lawyers in
6 the private suit that you have against the station. But I
7 would urge you not -- I would direct you not to talk about
8 your testimony or any of the questions that were asked to
9 anybody else.

10 THE WITNESS: Okay

11 JUDGE STEINBERG: You can talk to your wife.

12 THE WITNESS: Okay. Thank you.

13 JUDGE STEINBERG: And your children, you know, but
14 I am talking about anybody that's connected with this case.

15 THE WITNESS: Since my attorney was not present
16 and could not be here, is it possible for him to get any
17 information on my testimony?

18 JUDGE STEINBERG: Sure. This is all public.

19 THE WITNESS: Okay

20 JUDGE STEINBERG: So you can give him Mr. Zauner's
21 number.

22 THE WITNESS: Okay.

23 JUDGE STEINBERG: Or give him the court reporter's
24 card. Drumming up a little business for the court reporter
25 in here.

1 THE WITNESS: Okay

2 JUDGE STEINBERG: And I am sure they would be
3 happy to provide you with a copy of the transcript for which
4 you will pay a large amount of money.

5 Okay, so you are excused. Thank you.

6 THE WITNESS: For the record, I mean, I'm --

7 JUDGE STEINBERG: Yes, you can go home.

8 THE WITNESS: Okay

9 JUDGE STEINBERG: Unless you want to stick around,
10 but I wouldn't if I were you

11 Okay, thank you.

12 THE WITNESS: Thank you.

13 JUDGE STEINBERG: Appreciate your coming.

14 (Witness excused.)

15 JUDGE STEINBERG: One-thirty?

16 MR. ZAUNER: We would even go for 1:15. We will
17 make it 1:30. That's fine.

18 JUDGE STEINBERG: Yes, 1:30, we will be recessed
19 until 1:30.

20 (Whereupon, at 12:15 p.m., the hearing was
21 recessed, to resume at 1:30 p.m., this same day, Tuesday,
22 May 21, 1996.)

23 //

24 //

25 //

1 A I do, sir.

2 Q What is your present occupation?

3 A Sales, senior sales representative for urban
4 contemporary station in the Memphis market.

5 Q And what are the call letters of that station?

6 A KJMS.

7 Q How long have you worked in the broadcasting
8 industry?

9 A Since April of 1964

10 Q Could you give us a brief summary of your
11 broadcast experience?

12 A I started my broadcast career at WMPS, Plow
13 Broadcasting, in Memphis, in 1964, as a salesman, evolving
14 into 14 years that I was with them to general sales manager,
15 and then on to vice president and general manager of the
16 station.

17 I left there in July of '77, and went to Clear
18 Channel Communications when they were an infant, so to
19 speak, and took over an operation in El Paso, Texas. The
20 then call letters were KELP.

21 I left there, was there for about a year and a
22 half. Moved back to Memphis. Memphis, I'll tell you, is
23 kind of my home port, if you didn't know that already.
24 Moved back to Memphis to work for Sam Phillips at WLVS-WWEE.
25 he was just putting these two stations together. He had

1 owned the AM station and had just gotten an FM frequency and
2 got it on the air.

3 I was there for two years, and then I went to work
4 for Jack Roth in San Antonio at KITY-KONO. Was there for a
5 year and a half, and went to -- I'm trying to remember.
6 This is ancient history. I went to work for William B.
7 Tanner in Memphis for two years.

8 And then I went to -- I left there, I think it was
9 '82, and went to WYOU in Tampa, Florida. I was there for
10 three years.

11 I left there in December of '85, and went to as a
12 group manager in Huntsville, Alabama, four AM stations. I
13 was not a station manager. I was a group manager in that
14 particular situation.

15 I was there for three years, and then went to,
16 gosh, I can't remember the call letters, W -- no -- W102 was
17 in Chattanooga. I don't remember the call letters just
18 offhand. I was there for two years.

19 Then went to --

20 THE WITNESS: Excuse me. Judge, may I pull off my
21 coat?

22 JUDGE STEINBERG: Sure.

23 THE WITNESS: I'm a little steamy.

24 JUDGE STEINBERG: Take your coat off, take your
25 tie off. Your pants stay on.

1 (Laughter.)

2 THE WITNESS: Thank you, sir.

3 JUDGE STEINBERG: Just do whatever you need to do
4 to be comfortable.

5 THE WITNESS: Okay, thanks.

6 I left Chattanooga and went to Galveston, Texas,
7 to manage KILE in Galveston. I was there a year and a half,
8 and then went to St. Angelo, Texas, to manage a new company
9 that was being just put on the air. The company that owned
10 it went into default before it hardly celebrated a year and
11 the station went dark.

12 And that's when I went to work for Contemporary
13 Media. This would have been in, I think, December of '81.

14 BY MR. ZAUNER:

15 Q You mean '91?

16 A '91. Excuse me.

17 MR. ZAUNER: Your Honor, just for the record,
18 there was some question as to the dates of employment, or
19 the dates of employment of John Rhea.

20 JUDGE STEINBERG: Right.

21 MR. ZAUNER: And counsel for the Licensees have
22 informed me that in fact his dates of employment were
23 December 30, 1991 to December 16, 1992.

24 JUDGE STEINBERG: Is that correct?

25 MR. GAFFNEY: That's correct, Your Honor.

1 JUDGE STEINBERG: Okay, so that will be stipulated
2 to.

3 MR. GAFFNEY: Yes, Your Honor.

4 JUDGE STEINBERG: About two weeks less than a
5 year.

6 MR. GAFFNEY: That's correct.

7 BY MR ZAUNER:

8 Q Who hired you to work for Contemporary?

9 A Janet Cox.

10 Q And was that Contemporary Media, Inc. or
11 Contemporary Broadcasting, Inc. or do you know?

12 A Contemporary Media, and that was out of St.
13 Charles, Missouri.

14 Q What position were you hired for?

15 A General manager of both ZZQ and BOW, WBOW.

16 Q And WBOW is the AM and ZZQ was the FM.

17 A Yes, sir.

18 Q Is that correct?

19 A That's correct.

20 Q What were your duties as general manager?

21 A My basic duties there when they hired me and Janet
22 kind of put it to me kind of straight, is mainly to run the
23 sales department, and, of course, oversee the general
24 operation of the radio station.

25 I was not that involved in programming as we will